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16 *Counsel for Defendant Meta Platforms, Inc.*

17 **UNITED STATES DISTRICT COURT**
 18 **NORTHERN DISTRICT OF CALIFORNIA**
 19 **SAN FRANCISCO DIVISION**

20 RICHARD KADREY, *et al.*,
 21 Individual and Representative Plaintiffs,
 22 v.
 23 META PLATFORMS, INC., a Delaware
 corporation;
 25 Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF MORVARID METANAT IN
SUPPORT OF META'S OPPOSITION TO
PLAINTIFFS' LETTER BRIEF REGARDING
THE DEPOSITION OF SY CHOUDHURY**

1 I, Morvarid Metanat, hereby declare:

2 1. I am Director and Associate General Counsel, Artificial Intelligence Product at Meta
3 Platforms, Inc. (“Meta”) I am a member in good standing of the state bar of California.

4 2. The contents of this declaration are based on my personal knowledge and if called
5 as a witness, would testify to the matters contained herein.

6 3. In my role as Director and Associate General Counsel, Artificial Intelligence
7 Product at Meta, I provide legal advice to the product and engineering groups regarding artificial
8 intelligence (AI) products and technology.

9 4. In or around the first week of April, 2023, I participated in a privileged meeting with
10 Mr. Marc Shedroff and other persons in leadership regarding whether to pause outreach to
11 publishers. During that same week, I participated in another privileged meeting with Mr. Shedroff
12 and Mr. Sy Choudhury regarding whether to pause outreach to publishers. During both meetings,
13 I provided legal advice regarding the legal risks of whether to pause outreach to publishers. In or
14 around the first week of April, 2023, the decision was made to pause publisher outreach.

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16 I declare under penalty of perjury under the laws of the United States of America that the
17 foregoing is true and correct.

18 Executed in San Diego, California on this 12th day of December, 2024.

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21 Morvarid Metanat

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